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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

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UNITED STATES OF AMERICA

§ INDICTMENT

U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY

v.

SA15CR03920G

RUBEN RANGEL (1),
OSCAR TORRES-SANTOS (2),
SERGIO DELAPAZ-TREVINO (3),

§ [Violation: Count One -- 21 U.S.C. §§
§ 841(a)(1)&(b)(1)(A) and 846, Conspiracy to
§ Distribute Controlled Substance, involving
§ Methamphetamine weighing more than 50
§ grams, cocaine weighing more than 5
§ kilograms, and heroin weighing more than 1
§ kilogram; Count Two -- 18 U.S.C. § 1956(h),
§ Conspiracy to Launder Monetary
§ Instruments]

ABELARDO HERNANDEZ (5),

ALEXIS CASTILLO (9),

JOEL VILLARREAL (12),
CESAR TORRES-SANTOS (13),
BONIFACIO MACIAS (14),

LUIS CARDONA-RAMIREZ (16),

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 841(a)(1)&(b)(1)(A) and 846]

Beginning in or about August 2013, and continuing through and including the date of this
indictment, in the Western District of Texas, and elsewhere, Defendants,

RUBEN RANGEL (1),
OSCAR TORRES-SANTOS (2),
SERGIO DELAPAZ-TREVINO (3),

ABELARDO HERNANDEZ (5),

ALEXIS CASTILLO (9),

**JOEL VILLARREAL (12),
CESAR TORRES-SANTOS (13),
BONIFACIO MACIAS (14),**

LUIS CARDONA-RAMIREZ (16),

knowingly, intentionally, and unlawfully combined, conspired, confederated, and agreed together and with others known and unknown to distribute, and possess with the intent to distribute, a controlled substance, which offense involved a quantity of 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a quantity of 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, and a quantity of 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, Schedule II Controlled Substances, contrary to Title 21, United States Code, §§ 841(a)(1)&(b)(1)(A) and 846.

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance as set out below involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY	STATUTE
RUBEN RANGEL (1)	5 kilograms or more of cocaine, 50 grams or more of methamphetamine, and 1 kilogram or more of heroin	21 U.S.C. § 841(b)(1)(A)
OSCAR TORRES-SANTOS (2)	5 kilograms or more of cocaine, 50 grams or more of methamphetamine, and 1 kilogram or more of heroin	21 U.S.C. § 841(b)(1)(A)
SERGIO DELAPAZ-TREVINO (3)	1 kilogram or more of cocaine, and 50 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A) 21 U.S.C. § 841(b)(1)(B)
ABELARDO HERNANDEZ (5)	1 kilogram or more of heroin	21 U.S.C. § 841(b)(1)(A)
ALEXIS CASTILLO (9)	50 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
JOEL VILLARREAL (12)	1 kilogram or more of cocaine	21 U.S.C. § 841(b)(1)(B)
CESAR TORRES-SANTOS (13)	1 kilogram or more of cocaine	21 U.S.C. § 841(b)(1)(B)
BONIFACIO MACIAS (14)	1 kilogram or more of cocaine	21 U.S.C. § 841(b)(1)(B)
LUIS CARDONA-RAMIREZ (16)	50 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

[18 U.S.C. §§1956(h), 1956(a)(2)(A), 1956(a)(2)(B)]

Beginning in or about August 2013, and continuing through and including the date of this indictment, in the Western District of Texas, and elsewhere, Defendants,

**RUBEN RANGEL (1),
OSCAR TORRES-SANTOS (2),
SERGIO DELAPAZ-TREVINO (3),**

ABELARDO HERNANDEZ (5),

ALEXIS CASTILLO (9),

**JOEL VILLARREAL (12),
CESAR TORRES-SANTOS (13),
BONIFACIO MACIAS (14),**

LUIS CARDONA-RAMIREZ (16),

did unlawfully, knowingly and intentionally combine, conspire, confederate and agree, together, and with others known and unknown to the Grand Jury, to violate 18 U.S.C. § 1956(a)(2)(A) and 18 U.S.C. § 1956(a)(2)(B) , that is, transport monetary instruments, to-wit: United States currency, from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity, namely, conspiracy to distribute, and possess with intent to distribute, a controlled substance as alleged in Count One of this Indictment; and further

knowing the monetary instruments were the proceeds of the said specified unlawful activity, and intended the transport of the currency to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(h).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

Drug Violations and Criminal Forfeiture Statutes

[Title 21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846), subject to forfeiture pursuant to Title 21 U.S.C. §§ 853(a)(1) and (2)]

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to Defendants RUBEN RANGEL (1), OSCAR TORRES-SANTOS (2), SERGIO DELAPAZ-TREVINO (3),

ABELARDO HERNANDEZ (5),

ALEXIS CASTILLO (9),

JOEL VILLARREAL (12), CESAR TORRES-SANTOS (13),

BONIFACIO MACIAS (14),

LUIS CARDONA-RAMIREZ (16),

of its intent to seek the forfeiture of the below described property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. §§ 853(a)(1) and (2), which state:

Title 21 U.S.C. § 853.

(a) Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law –

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; ...

This Notice of Demand for Forfeiture includes, but is not limited to, the following:

Money Judgment

A sum of money equal to \$750,000.00, representing the amount of proceeds obtained directly or indirectly as a result of the violations set forth in Counts One and Two, for which said Defendants are jointly and severally liable.

Substitute Assets

If any of the properties described above, as a result of any act or omission of said Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. have been transferred or sold to, or deposited with, a third person;
- c. have been placed beyond the jurisdiction of the Court;
- d. have been substantially diminished in value; or
- e. have been commingled with other property which cannot be subdivided without difficulty;

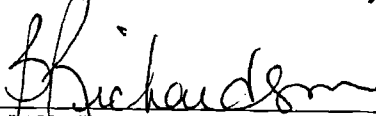
it is the intent of the United States of America to seek the forfeiture of any other property owned by said Defendants up to the value of said Money Judgment as substitute assets, pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. § 853(p).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN, JR.
Acting United States Attorney

By:



BETTINA RICHARDSON
Assistant United States Attorney
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